

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

CRAIG HAMELIN and MICHAEL  
MCCARRON, Individually and as representatives  
of all others similarly situated

Plaintiffs,

v.

KINDER MORGAN, INC., KINDER  
MORGAN ENERGY PARTNERS, L.P.,  
TENNESSEE GAS PIPELINE CO., LLC, THE  
BERKSHIRE GAS COMPANY, and  
AVANGRID, INC.

Defendant.

Case No.: 21-cv-30054

**PLAINTIFFS' RESPONSE TO DEFENDANTS' MOTION TO DISMISS  
COUNT II OF PLAINTIFFS' COMPLAINT**

Plaintiffs do not oppose Defendants' Motion and agrees to withdraw Count II, Fraudulent  
Concealment as a separate cause of action but maintains the allegations detailed in the Complaint.

Dated: June 25, 2021

Respectfully Submitted,

  
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*Attorney for Plaintiff*

**CERTIFICATE OF SERVICE**

I, Paula S. Bliss, Esq., do hereby certify that on this 25<sup>th</sup> day of June, 2021 I served the foregoing document on all counsel of record via the court's CM/ECF electronic filing system.



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Paula Bliss, Esq.